

Investigation by the Department of Telecommunications and Energy on its own Motion pursuant to G.L. c. 159, §§ 12 and 16, Into the collocation security policies of Verizon New England Inc d/b/a Verizon Massachusetts	) ) ) ) ) ) )	D.T.E.: 02-8
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## INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Verizon New England d/b/a Verizon Massachusetts ("Verizon MA" or "Company") or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.
6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.

7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide Consent with the responsive documents, and requests Consent to inspect documents at any location is not responsive.
13. If you refuse to respond to any Document and Information Request by reason of a claim of privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide two copies of each response.

16. Unless the Request specifically provides otherwise, the term "Company" refers to Verizon MA's intrastate operations and includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.
18. Please provide all responses to requests within 10 business days from receipt of request, as established by the Hearing Officer's Ground Rules dated February 27, 2002.

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**Conversent 1-1:** Please refer to page 2 of Verizon's Panel Testimony where it references the currently available collocation arrangements and the applicable security measures for central offices and other collocated facilities. (a) Please provide a list that identifies by location each of the Verizon-MA' central offices and the specific types of collocations that exist in each of those central offices; (b) For each of these central office locations, please indicate whether such office is equipped with (i) surveillance cameras; (ii) electronic card readers; (iii) whether badges with computerized tracking systems have been issued to persons having access to such central offices. If badges with computerized tracking have been issued, please indicate the number of badges that have been issued to Verizon employees and the number of badges that have been issued to CLECs in Massachusetts.

**Conversent 1-3:** Does Verizon-MA's security policy permit CLECs to install their own video surveillance equipment in the space that they lease from Verizon-MA to monitor their equipment in Verizon-MA's central offices? Please identify where in Verizon-MA's security policies it states that CLECs are not permitted to install their own video surveillance equipment to protect their collocated equipment.

**Conversent 1-4:** Please refer to page 3, line 17, of Verizon's Panel Testimony where it states that "the most effective means of insuring network safety and liability is to eliminate physical collocation entirely in all of its COs, converting existing physical collocation arrangements to virtual and requiring that all future collocation arrangements be virtual only." Please answer the following questions:

- a. Please provide a list of central offices in which Verizon has established separate space for collocating carriers;
- b. Please provide a list of all central offices that have separate entrances for collocating carriers;
- c. Please identify all instances where a collocating carrier's actions were responsible for a Verizon network outage within the central office;
- d. Please identify all instances where a Verizon-MA technician's actions were responsible for a network outage within the central office;
- e. What proposal is Verizon making to protect CLEC equipment from Verizon employees?
- f. What proposal is Verizon making to protect CLEC equipment from terrorists?

**Conversent 1-5:** Does Verizon-MA keep logs that reflect access to each collocation arrangements by Verizon employees, Verizon vendors and CLEC employees? If it does not, why doesn't Verizon-MA keep logs?

**Conversent 1-6:** Please refer to page 4, line 5 through page 5, line 4 of the Verizon Panel Testimony where Verizon proposes certain proactive collocation security measures it believes should be adopted based on the potential for network harm and Verizon's experience with security breaches in Massachusetts and elsewhere and answer the following questions:

- a. Please provide a list of the Verizon-MA central offices that have a collocating carrier's equipment co-mingled with Verizon equipment;
- b. Please provide a list of Verizon-MA central offices that Verizon intends to identify as "high" security risk central offices and therefore subject to "virtual collocation only" sites;
- c. Please provide a list of all Verizon-MA central offices in which Verizon proposes to require an escort.

**Conversent 1-7:** Please refer to page 5, line 8 of the Verizon Panel Testimony in which it states that Verizon-MA plans to implement an in-depth, prescreening of collocated carrier personnel.

- a. Please provide the current screening requirements for issuing a Verizon badge to CLEC employees;
- b. Please provide the current screening procedures for issuing a Verizon badge to Verizon employees;
- c. Verizon badge to Verizon vendors.

**Conversent 1-8:** Please refer to page 6, line 1 of the Verizon Panel Testimony where it states that "strengthened security procedures will also reduce the degree of risk to Verizon-MA's facilities."

- a. What security measures has Verizon-MA implemented to prevent the theft or harm of CLEC equipment in Verizon-MA's central offices?

**Conversent 1-9:** Please refer to page 10, lines 13-15 of the Verizon-MA's Panel Testimony where it states that "CCOE arrangements may not require the construction of a separate collocation area, e.g., a separate room or isolated space segregated from Verizon's own network equipment." Please identify the CCOE arrangements that are not located in a secure separate space within Verizon's CO premises.

**Conversent 1-10:** Please refer to page 11, line 4 of the Verizon Panel Testimony where it describes that for purposes of virtual collocation, "the CLEC leases its equipment to Verizon-MA to install, maintain, upgrade and repair on Verizon's premises under the direction - and for the benefit - of the CLEC."

- a. Who is responsible for training the Verizon central office technicians on the equipment used by CLECs?
- b. Please provide a copy of all documents and policies that are used to train such technicians about the equipment used by CLECs.
- c. Of the four-(4) virtual collocation arrangements used in Massachusetts, how many are utilized due to space limitations?

**Conversent 1-11:** Please refer to page 13, line 3 of the Verizon Panel Testimony where it references the current security measures that are set forth in 47 C.F.R. § 51.323(i).

- a. Please provide a list of central offices in which Verizon-MA has deployed the use of badges with computerized tracking systems;
- b. Please provide a list of collocating carriers that have been issued badges with computerized tracking systems;
- c. Please provide the number of Verizon-MA employees and vendors that have been issued badges with computerized tracking systems;
- d. Please define how Verizon-MA's electronic card reader system is similar to or different from the systems being used by other ILECs.
- e. Please provide the method that Verizon-MA uses to pre-screen employees, vendors and collocating carriers before issuing a badge with computerized tracking;
- f. Please provide all written materials that reflect the methods that Verizon-MA uses for such purposes;
- g. Please provide all documentation used in training Verizon-MA employees on collocation security, and the number of employees that have been provided that training;
- h. For each of Verizon-MA's central offices, please identify the security measures that are currently in place;

- i. Please provide a list of the approved Verizon-MA vendors that have access to its central offices in Massachusetts;

**Conversent 1-12:** Please refer to page 19, line 4 of the Verizon Panel testimony where it states that "*the use of cameras alone* is neither an effective nor efficient proactive security method." Please admit or deny that real-time monitoring through the use of camera surveillance would improve security in central offices. Please identify any documents or studies that indicate that the use of such cameras would not improve security in ILEC central offices.

**Conversent 1-13:** Please refer to page 14, lines 10 through 12 of the Verizon Panel Testimony where it states that "Verizon may provide escorts, at no cost to CLECs, prior to implementation of permanent security measures at a CO." Over the past 12 months, how many such escorts were provided to CLECs?

**Conversent 1-14:** Please refer to page 20, line 14 of the Verizon Panel Testimony where it states that there have been incidents where collocating carriers have not reported lost access cards and that CLEC personnel or agents have used access cards belonging to others.

- a. Please provide the documentation that supports this claim;
- b. Is Verizon aware of instances in which Verizon employees have not reported lost access cards or returned cards given to former employees and representatives?
- c. Please identify whether Verizon is aware of its own employees, agents or vendors using cards belonging to others;
- d. How many Verizon employees have been disciplined for failing to display an identification badge in the last 12 months in Massachusetts;

**Conversent 1-16:** Please refer to page 26, line 7 of the Verizon Panel Testimony where it references critical central offices such as those with tandem switches or Signal Transfer Points ("STP").

- a. Please provide a list of central offices with tandem switches;
- b. Please provide a list of central offices with STPs;
- c. Please provide a copy of Verizon's collocation guidelines issued in June 2000.

**Conversent 1-17:** Please refer to footnote 25 on page 31 of the Verizon Panel Testimony where it states that "Verizon's own employees undergo significant training before they are permitted to work in CO, and some are even specifically trained and authorized to work on particular CO equipment, as noted above." Please identify all of the training that Verizon's own employees undergo before they are permitted to work in the CO. Please provide the average number of

training days for each Verizon technician and provide copies of all training manuals.

**Conversent 1-18:** Please refer to footnote 25 on page 31 of the Verizon Panel Testimony where it states that "untrained CLEC employee/agent may accidentally damage Verizon-MA equipment while working on the CLECs equipment, or may inadvertently work on Verizon-MA's equipment in a co-mingled environment." Please identify all instances where Verizon asserts that "untrained" CLEC employees or agents have accidentally damaged Verizon-MA's equipment while working on the CLECs equipment, or inadvertently worked on Verizon-MA equipment in a co-mingled environment. Please provide the date and location for each such instance.

**Conversent 1-19:** Please refer to footnote 26 on pages 31 and 32 of the Verizon Panel Testimony where it states that to "the extent that CLEC and Verizon equipment may be the same, this also increases the likelihood that "spare parts" on hand in Verizon CO will be "poached" if needed by a collocated carrier for provisioning or maintenance purposes, based on Verizon's actual experience nationwide in physically collocated COs." Please provide all instances in which Verizon has documented that spare parts in a Verizon central office in Massachusetts has been poached by a collocated carrier. Please provide the dates and locations of such instances. Please also provide all service outages that Verizon has experienced in Massachusetts when a CLEC has allegedly borrowed, "in-use" Verizon equipment parts for their own needs, without Verizon's permission or prior knowledge.

**Conversent 1-20:** Please refer to page 30 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has not determined the costs associated with its proposed collocation security plan."

- a. Please provide the costs associated with each of Conversent's 54 collocation arrangements to implement Verizon-MA's proposed collocation security plan.
- b. For each of Conversent's 54 collocation arrangements, please indicate which of such arrangements do not provide for a separate and secure space, segregated from Verizon-Ma's own network equipment.



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